

1 Bradley S. Keller, WSBA #10665
2 Ralph E. Cromwell, Jr., WSBA #11784
3 Jofrey M. McWilliam, WSBA #28441
4 Byrnes Keller Cromwell LLP
5 1000 Second Avenue, 38th Floor
6 Seattle, WA 98104
7 (206) 622-2000
8 Facsimile No.: (206) 622-2522

9
10 Attorneys for Perkins Coie LLP
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

The Honorable Frederick P. Corbit
Chapter: 7

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In Re:

GIGA WATT, INC., a Washington
corporation,

Debtor.

MARK D. WALDRON, as Chapter 7
Trustee,

Plaintiff,

vs.

PERKINS COIE, LLP, a Washington
limited liability partnership; LOWELL
NESS, individual and California resident;
GIGA WATT PTE., LTD. a Singapore
corporation; and ANDREY KUZENNY, a
citizen of the Russian Federation;

Defendants

and

THE GIGA WATT PROJECT, a
partnership,

Nominal defendant.

No. 18-03197-FPC11

The Honorable Frederick P. Corbit

CHAPTER 7

Adv. Case No. 20-80031

**NOTICE OF HEARING ON
JOINT MOTION FOR ORDER
TO SHOW CAUSE RE
SUBPOENA TO INTUIT INC.**

**Via Zoom, with Oral Argument
Thursday, June 2, 2022
11:00 a.m.**

NOTICE OF HEARING ON JOINT MOTION FOR ORDER
TO SHOW CAUSE RE SUBPOENA TO INTUIT INC. - 1

BYRNES ♦ KELLER ♦ CROMWELL LLP
38TH FLOOR
1000 SECOND AVENUE
SEATTLE, WASHINGTON 98104
(206) 622-2000

1 Perkins Coie, LLP, Lowell Ness (collectively “Perkins”), and the Trustee
2 hereby note for hearing their Joint Motion for an Order to Show Cause re Subpoena to
3 Intuit Inc., pursuant to Federal Rule of Bankruptcy Procedure 9016 and Federal Rule
4 of Civil Procedure 45(g). The hearing has been scheduled for 11:00 a.m. prevailing
5 Pacific Time before the Honorable Frederick P. Corbit, United States Bankruptcy
6 Court Judge, by Zoom. All parties wishing to participate must connect to the hearing
7 via Zoom on the designated date at the designated time. The Zoom information
8 regarding attendance of the hearing and sent to the parties by the Clerk of the Court is
9 set forth below:

Zoom Meeting Link:	https://www.zoomgov.com/j/1607750403?pwd=STNINURaaVZCa1FEeXJZS0JoSU9zdz09
Meeting ID:	160 775 0403
Pass Code:	769939
One Tap Mobile:	+16692545252,,1607750403#,,,*769939# US (San Jose) +16692161590,,1607750403#,,,*769939# US (San Jose)
Dial by Location:	+1 669 254 5252 US (San Jose) +1 669 216 1590 US (San Jose) +1 646 828 7666 US (New York) +1 551 285 1373 US
Link to find local number if not listed:	https://www.zoomgov.com/u/abM3JIa80i

**NOTICE OF HEARING ON JOINT MOTION FOR ORDER
TO SHOW CAUSE RE SUBPOENA TO INTUIT INC. - 2**

BYRNES ♦ KELLER ♦ CROMWELL LLP
38TH FLOOR
1000 SECOND AVENUE
SEATTLE, WASHINGTON 98104
(206) 622-2000

DATED this 27th day of May, 2022.

BYRNES KELLER CROMWELL LLP

POTOMAC LAW GROUP PLLC

By /s/ Bradley S. Keller
Bradley S. Keller, WSBA #10665

Bradley S. Keller, WSBA #10665

By /s/ Ralph E. Cromwell, Jr.
Ralph E. Cromwell, Jr., WSBA #11784

By /s/ Jofrey M. McWilliam
Jofrey M. McWilliam, WSBA #28441
1000 Second Avenue, 38th Floor
Seattle, Washington 98104
206-622-2000

Fax: (206)-622-2522

Email: bkeller@byrneskeller.com
rcromwell@byrneskeller.com
jmwilliam@byrneskeller.com

MUNDING, P.S.

By /s/ John Munding

John Munding, WSBA #21734
309 E. Farwell Rd., Suite 310
Spokane, Washington 99218
509-590-3849
Fax: (509) 624-6155
Email: john@mundinglaw.com

*Attorneys for Perkins Coie LLP and
Lowell Ness*

By /s/ Pamela M. Egan

Pamela M. Egan, WSBA #54736

1905 7th Avenue W.

Seattle, WA 98119-2815

415-297-0132

Email: egan@potomaclaw.com

*Attorneys for Mark D. Waldron
Chapter 7 Trustee, Plaintiff*

**NOTICE OF HEARING ON JOINT MOTION FOR ORDER
TO SHOW CAUSE RE SUBPOENA TO INTUIT INC. - 3**

BYRNES ♦ KELLER ♦ CROMWELL LLP
38TH FLOOR
1000 SECOND AVENUE
SEATTLE, WASHINGTON 98104
(206) 622-2000

1
2 **CERTIFICATE OF SERVICE**
3
4
5

6
7 I hereby certify that on this 27th day of May, 2022, I electronically filed the
8 foregoing with the Clerk of the Court using the CM/ECF System, which in turn
9 automatically generated a Notice of Electronic Filing (NEF) to all parties in the case
10 who are registered users of the CM/ECF system. The NEF for the foregoing
11 specifically identifies recipients of electronic notice.
12
13

14 By /s/ Ralph E. Cromwell, Jr.
15 Ralph E. Cromwell, Jr.
16 *Attorneys for Plaintiffs*
17 1000 Second Avenue, 38th Floor
18 Seattle, Washington 98104
19 206-622-2000
20 Fax: 206-622-2522
21 Email: rcromwell@byrneskeller.com
22
23
24
25
26

NOTICE OF HEARING ON JOINT MOTION FOR ORDER
TO SHOW CAUSE RE SUBPOENA TO INTUIT INC. - 4

BYRNES ♦ KELLER ♦ CROMWELL LLP
38TH FLOOR
1000 SECOND AVENUE
SEATTLE, WASHINGTON 98104
(206) 622-2000